P.O. Box 15830, Sacramento, CA 95852-1830; 1-888-742-SMUD (7683)

July 10, 2009

RETI Stakeholders Steering Committee Clare Laufenberg Gallardo California Energy Commission 1516 Ninth Street Sacramento, CA 95814-5512

RE: RETI Phase 2A Report

Stakeholders Steering Committee Members:

SMUD has two comments on the RETI Phase 2A draft report that address implementation issues associated with recommendations in the draft report.

1) Recommendation 2 should be modified to Section 3.10 Policy Recommendation (pgs. 3-70, 3-71) to read as follows:

"In order to avoid duplicative or redundant facilities, California planning authorities work closely with one another to identify, propose, study and approve joint IOU-POU projects, and eliminate barriers to joint use of such facilities. The California Transmission Planning Group (CTPG), which includes representatives of the major transmission owners and operators in California, should build onto the recommendations in this report during RETI Phase 3 to develop detailed and integrated transmission plans that incorporate not only renewable energy access but also congestion, reliability, and load serving needs as well."

2) Recommendation 3 in Section 3.10 Policy Recommendations should be modified as follows:

"Multiple transmission charges be eliminated for purposes of all transmission line segments built primarily to access and deliver renewable energy in California, so that all transmission customers buying renewable energy sourced from California CREZ pay only one transmission charge unless they elect to acquire multiple service. On joint IOU-POU transmission lines, for example, IOU customers would pay only the CAISO transmission



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charge and POU customers would pay only a POU transmission charge; in neither case would a customer pay both CAISO and POU transmission charges unless they have elected to procure the transmission service through an approved OATT tariff."

Thank you for the consideration of these comments. Please contact me at 916-732-6757 (or jshetle@smud.org) or Michael DeAngelis at 916-732-6589 (or mdeange@smud.org).

Very truly yours,

James Shetler,

Assistant General Manager, Energy Supply